

---

**From:** Bendheim, Gilad  
**Sent:** Tuesday, May 24, 2022 6:39 PM  
**To:** ConsumerFiling@adr.org  
**Cc:** Lefkowitz, Jay P.; Davis, Kelsey  
**Subject:** Case Number: 01-22-0001-8331 -- Shawn Justis vs. Ciox

Dear Consumer Filing Team,

We are counsel for Ciox in the above-captioned matter, and write in response to the May 12, 2022 letter we received regarding the initiation of this matter. Based on our review of the demand—which disclaims that the claimant is even bound by the arbitration provision under which she initiates this arbitration—we believe this matter has been improperly initiated and, as alleged, is not subject to arbitration or the AAA's jurisdiction. Accordingly, while we attempt to work this out with counsel for Ms. Justis, we do not believe it would be appropriate to pay the fees listed in the letter related to the initiation of this matter or arbitrator compensation, which are otherwise due on May 26. Once we have had an opportunity to consult with Ms. Justis's counsel, we will again be in touch about appropriate next steps.

Best,

**Gilad Bendheim**

---

**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue, New York, NY 10022  
**T** +1 212 390 4004  
**F** +1 212 446 4900  
**M** +1 201 315 9435

---

[gilad.bendheim@kirkland.com](mailto:gilad.bendheim@kirkland.com)